

Comments for USDA Listening Session  
December 6, 2005  
Airport Hilton Hotel, Kansas City, MO

I am Jim Riemann, President of Certified Angus Beef LLC. I am speaking today with support of John R. Crouch, Executive Vice-President of the American Angus Association, and the nearly 35,000 producer members of the American Angus Association (AAA).

I thank the USDA Agricultural Marketing Service for holding this listening session and providing interested parties the opportunity to give input into the important issue of whether the agency should use DNA technology in delivering its services. The agency should be both applauded and cautioned for its effort to utilize the latest technology to capture efficiencies and achieve greater accuracy and consistency in providing grading, certification, and verification services. But, it is critical that the agency only select and utilize those technologies that add value and integrity to its services.

Breed associations of all species have always had as their primary responsibility the description and characterization of purebred animals of the breed plus maintaining a record of each purebred animal. Breed associations have always been the single authority for breed identification and have used emerging technologies for that purpose.

USDA has traditionally recognized this primary role of breed associations and wisely relied on the associations to provide specifications for breed identification, and the agency restates this position in the Dec. 30, 2002, Federal Register addressing marketing claims. It says, "Claims for breed of livestock must meet criteria established by an AMS-recognized U.S. breed association for the referenced breed. If the breed association does not establish criteria for this claim, animals must be traceable to a parent registered with a breed association." I am pleased to report the American Angus Association has a USDA Process Verified Program called AngusSource<sup>SM</sup> that enables each individual animal to be identified and traced to a bull registered with the AAA. I believe it is essential, for genetic heritage claims to be honest, that each individual animal be identified and traceable to a registered purebred parent.

This discussion about DNA use for breed identification is focused on the branded beef programs claiming Hereford or Angus influence. Hereford has two USDA certified programs using their name and Angus has 46 or more. Over eighty percent of carcasses going through USDA certification programs last year were marketed through a program claiming Angus influence. This appears to be about Angus, but my comments apply to all breeds

Today's discussion is also about commercialization of one genomic firm's DNA technology for breed identification by first getting USDA to endorse the technology instead of the firm first working with the respective breed associations to get approval of the technology. It would be reckless and irresponsible of USDA to endorse such technology without the respective breed association's endorsement. It would be equally irresponsible if USDA endorsed DNA technology created by only one genomic company.

The USDA Agricultural Marketing Service apparently has not been concerned in the last few years about the plethora of Angus branded beef/USDA certified programs claiming Angus influence

because they have continued approving new programs that nearly span the entire beef carcass quality spectrum. No, this initiative is driven by pressure from a genomics company plus USDA's desire to be sure they are using up-to-date technology to deliver services. USDA does not need to be providing breed or genetic identification and/or verification services to the beef industry. That is the role of purebred breed organizations. I am pleased the American Angus Association has recognized this need and has started providing that service. I anticipate when other breeds see a similar need, they will respond appropriately.

A thorough study of the many USDA certified programs, that claim Angus influence, shows every beef carcass quality grade (except USDA Cutter and Canner---old cow carcasses for boneless beef) represented by some Angus brand. The list ranges from the youngest highest quality carcasses (A maturity, USDA Prime) to the oldest cull cows (E maturity, USDA Utility and Commercial grades). There are vast differences in eating quality of beef products from those different quality grades and maturity groups. Yet, it is very possible that animals that passed a DNA test for Angus genetics will be present in every one of those quality levels and USDA certified programs.

Beef products with slight or small degrees of marbling are scientifically documented to have large variation in, and often undesirable, palatability traits---tenderness, flavor, and juiciness. Several Angus brands in retail stores use these degrees of marbling. It would be harmful to the Angus name to have bad steaks from those brands marked with a label giving information that the product is "DNA verified as Angus." Instead of reducing consumer confusion, it will increase!

How does DNA verification that a beef product came from an animal with fifty percent or more genetics of any breed help guarantee a high quality eating experience from the branded product? What is the taste of beef from Charolais or Hereford or Simmental or Limousin or Angus? In contrast, what is the taste of beef with slight, small, modest or slightly abundant degrees of marbling? That's a much easier question to answer.

Recent press releases imply simply being Angus will produce a consistent high quality eating experience. A package label showing a DNA test verified the meat was from an animal with fifty percent Charolais, Simmental, Hereford, or Angus genetics does absolutely nothing to guarantee quality or eating satisfaction. Angus cattle are known for producing a higher percentage of USDA Choice carcasses, but like all other breeds, are capable of producing low grading carcasses. Consumers are sorting the good from the bad brands and will continue to vote with their dollars. But, these recent press releases mislead consumers.

I encourage USDA's Labeling and Consumer Protection Staff to withdraw all current label approvals and withhold approval of all label applications that identify product as DNA verified as Angus or any other breed. Approval of such labels should be done only after USDA Agricultural Research Service and USDA-AMS evaluate and approve, in cooperation with respective breed associations, appropriate technology for this purpose.

The American Angus Association, through its producer members, is providing leadership to the beef industry by creating a USDA Process Verified Program to identify Angus-sired cattle that will be supplying the many Angus branded beef programs. It is my desire that some time in the future, an

AngusSource<sup>SM</sup> tag will be required for any black-hided animal to become eligible for the *Certified Angus Beef*<sup>®</sup> brand and all of the other Angus branded beef programs.

I strongly recommend USDA leave breed identification issues to the respective breed associations.

Thank you.